

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GBM Global Holding Company Limited

Plaintiff,

v.

The Unidentified Individuals Listed On Schedule A,

Defendants.

Case No.

**EMERGENCY PETITION FOR
(1) A TEMPORARY
RESTRAINING ORDER IN AID
OF ARBITRATION; (2) AN
ORDER TO SHOW CAUSE
WHY A PRELIMINARY
INJUNCTION SHOULD NOT
ISSUE; AND (3) AN ORDER
AUTHORIZING
ALTERNATIVE SERVICE OF
THE TRO AND SHOW CAUSE
ORDER**

On July 23, 2021, or as soon thereafter as can be heard, Petitioner GBM Global Holding Company Limited (“Petitioner”), will and does hereby, before a United States District Court Judge, Southern District of New York, 500 Pearl St, New York, NY 10007, petition for an emergency temporary restraining order, as well as a preliminary injunction, pending an arbitration between the parties, as follows:

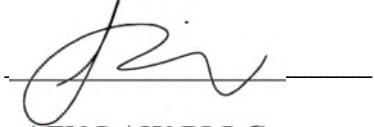
1. Enjoining Defendants listed in Schedule A to the Memorandum Of Law in Support of the Petition (“Memorandum”) from transferring cryptocurrencies they transferred to certain cryptocurrency exchanges listed in Schedule B to the Memorandum.

The grounds for Plaintiff’s motion are that immediate and irreparable injury will result to Plaintiff absent such a temporary restraining order, as more fully set forth in the Memorandum of Law and supporting Declarations submitted herewith.

For the foregoing reasons, Plaintiff respectfully requests that the Court grant the temporary restraining order requested herein and thereafter, a preliminary injunction

Dated: July 23, 2021.

Angus F. Ni

By: 

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